

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**SHAMARA T. KING,  
on behalf of herself and all others  
similarly situated**

**Plaintiff,**

**v.**

**GENERAL INFORMATION  
SERVICES, INC.,**

**Defendant.**

**Civil Action No. 10-6850**

**CLASS ACTION**

**PLAINTIFF'S SUPPLEMENTAL BRIEF IN SUPPORT THE UNITED STATES  
GOVERNMENT'S MEMORANDUM IN SUPPORT OF THE  
CONSTITUTIONALITY OF 15 U.S.C. § 1681**

Plaintiff Shamara King, by counsel, hereby submits her Supplemental Brief in Support of the United States Government's Memorandum in Support of the Constitutionality of 15 U.S.C. § 1681c (Dk. No. 52), pursuant to the joint request of the Parties to Set a Briefing Schedule dated March 27, 2012. (Dk. No. 51). The United States has been granted intervention in this matter to defend the constitutionality of FCRA section 1681c (Dk. No. 50) as challenged by Defendant General Information Services, Inc. in its Motion for Judgment on the Pleadings ("Motion"). (Dk. No. 40). For the reasons set forth more fully in her Memorandum of Law in Support of her Response in Opposition to Defendant's Motion for Judgment on the Pleadings (Dk. No. 46), Plaintiff believes that Defendant's Motion should be denied , and concurs with the United States' Memorandum of Law. Plaintiff respectfully requests oral argument.

Respectfully submitted,

Dated: May 18, 2011

**FRANCIS & MAILMAN, P.C.**

BY: /s/ Erin A. Novak  
JAMES A. FRANCIS  
JOHN SOUMILAS  
ERIN A. NOVAK  
Land Title Building, 19<sup>th</sup> Floor  
100 South Broad Street  
Philadelphia, PA 19110  
(215) 735-8600

**DONOVAN SEARLES, LLC**  
NOAH AXLER  
1845 Walnut Street, Suite 1100  
Philadelphia, PA 19103  
(215) 732-6067

**COMMUNITY LEGAL SERVICES, INC.**  
JANET F. GINZBERG  
MICHAEL HOLLANDER  
1424 Chestnut Street  
Philadelphia, PA 19102  
(215) 981-3745

**CONSUMER LITIGATION ASSOCIATES,  
P.C.**  
LEONARD A. BENNETT  
12515 Warwick Boulevard, Suite 100  
Newport News, VA 23606  
(757) 930-3660

Attorneys for Plaintiff and the Class

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was electronically filed on this date and that service is therefore being made electronically on the following counsel of record for Defendant:

Allen R. Bunker  
COMEAU & BUNKER  
Four Penn Center, Suite 500  
1600 JFK Boulevard  
Philadelphia, PA 19103

Cindy Hanson  
John R. Gibson  
KILPATRICK TOWNSEND & STOCKTON LLP  
1100 Peachtree Street, Suite 2800  
Atlanta, GA 30309

Gerald C. Kell  
Senior Trial Counsel  
U.S. Department of Justice  
Washington, DC 20044

/s/ Erin A. Novak  
Erin A. Novak

Dated: May 18, 2012